

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

**PINNACLE PACKAGING  
COMPANY, INC.,**  
an Oklahoma corporation,  
**POLO ROAD LEASING, LLC,**  
an Oklahoma limited liability company,  
and **J. SCOTT DICKMAN,**

Plaintiffs,

v.

**CONSTANTIA FLEXIBLES GmbH,**  
an Austrian corporation, and  
**ONE EQUITY PARTNERS  
(EUROPE) GmbH,**

Defendants.

Case No. 12-CV-537-JED-TLW

**DEFENDANTS' UNOPPOSED MOTION FOR OUT-OF-STATE  
COUNSEL TO APPEAR BY TELEPHONE**

Defendants Constantia Flexibles GmbH and One Equity Partners (Europe) GmbH move the Court for an Order granting permission to Defendants' out-of-state counsel to appear by telephone for the motions hearing on Tuesday, August 4, at 2:00 p.m.

1. Defendants' local counsel will be in physical attendance for the hearing.
2. Plaintiffs' counsel does not object to Defendants' out-of-state counsel's appearance by telephone.
3. A proposed Order is submitted to the Court along with this motion for the Court's convenience.

WHEREFORE, Defendants respectfully request that this Court grant their motion for out-of-state counsel to appear by telephone.

DATED: 29 July 2015

Respectfully submitted,

s/ John D. Russell

---

John D. Russell, OBA No. 13343

GABLEGOTWALS

1100 ONEOK Plaza

100 W. Fifth Street

Tulsa, OK 74103

Telephone: (918) 595-4800

Facsimile: (918) 595-4990

[jrussell@gablelaw.com](mailto:jrussell@gablelaw.com)

Marshall Fishman, *Pro Hac Vice*

Cheryl Howard, *Pro Hac Vice*

Aaron Lang, *Pro Hac Vice*

FRESHFIELDS BRUCKHAUS

DERINGER US LLP

601 Lexington Avenue, 31<sup>st</sup> Floor

New York, NY 10022

Telephone (212) 277-4000

Facsimile (212) 277-4001

[marshall.fishman@freshfields.com](mailto:marshall.fishman@freshfields.com)

[cheryl.howard@freshfields.com](mailto:cheryl.howard@freshfields.com)

[aaron.lang@freshfields.com](mailto:aaron.lang@freshfields.com)

**COUNSEL FOR DEFENDANTS**

### CERTIFICATE OF SERVICE

I hereby certify that on 29 July 2015, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants (names only are sufficient):

Laurence L. Pinkerton

James D. Jorgenson

Charles R. Willing

Aaron Lang

Gabrielle L. Gould

Cheryl Howard

s/John D. Russell

---

John D. Russell